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October 31, 2019

*Via ECF*

Honorable P. Kevin Castel  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: ***Unicomber Courts Dominica Ltd v Tropical Shipping USA LLC***  
19cv8537 (PKC)  
Our File: 424-82

Dear Honorable Judge:

We represent the plaintiff in the referenced matter.

The bill of lading issued by defendant Tropical Shipping USA LLC contains a mandatory forum selection clause requiring that all actions arising under said bill of lading are subject to the jurisdiction of the United States District Court for the Southern District of Florida.

Defense counsel have advised that they insist that we honor that clause.

Accordingly we respectfully request that Your Honor request that the Clerk of the Court transfer this case to the USDC SDFla.

*On plaintiff's motion and  
without apportionment, the  
action is transferred, pursuant  
to 28 U.S.C. § 1404(a), to  
the United States District Court  
for Southern District of Florida.  
The Clerk shall transfer the  
action and close the case in this  
district.*

*SO ORDERED*  
*11/13/19*